



The Marine  
Mammal Center

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April 16, 2008

The Honorable Susan Golding, Chair  
MLPA Initiative Blue Ribbon Task Force  
c/o California Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

Via email: [MLPLAComments@resources.calgov](mailto:MLPLAComments@resources.calgov)

Dear Honorable Chair Golding and Fellow BRTF Members:

This letter constitutes the comments of The Marine Mammal Center to the Blue Ribbon Task Force regarding the various proposals developed by the Regional Stakeholder Group for the North Central Coast under the Marine Life Protection Act. We would like our comments to be considered by the BRTF in making their recommended preferred alternative to the Dept. of Fish and Game Commission on April 23, 2008.

We are appreciative of the amount of energy and the spirit of cooperation and compromise exhibited by members of the RSG. We are also grateful to the MLPA initiative staff for their hard work and efforts. We feel privileged that the Center's Policy Liaison, Bob Wilson, was selected as an alternate RSG member and allowed to participate fully in the process.

Marine mammals, especially pinnipeds (seals and sea lions) are an important part of the ecosystem in the North Central Coast (NCC) region. In the NCC region some pinniped populations are not healthy and flourishing. Steller sea lions are threatened, with important rookeries within this area only on the Farallon Islands. The threatened Guadalupe fur seal uses this region to forage, and has been observed more frequently

within this area in recent years. Harbor seal numbers are at 1990 levels, fluctuate, and are not increasing.

Initially the Science Advisory Team (SAT) proposed to evaluate Marine Protected Areas (MPA) for harbor seals and Steller sea lions in three activities, forage, haul out and rookery protection. Both species were listed as species possibly likely to benefit from MPA's.

The latest SAT evaluation has dropped Steller sea lions from the list of species likely to benefit, presumably because they primarily forage outside state waters. During the RSG process a number of Special Closure Areas were proposed to benefit Steller sea lions. During the compromise process that developed, proposals for the reef area north of the Fort Ross and Bodega Rocks were dropped. However, we believe that two potential Special Closure Areas can provide additional protection to Steller sea lion rookeries. It should be noted that the Federal government (National Marine Fisheries Service) has designated 3000 feet around two areas of the Farallon islands as "Critical Habitat" for this threatened species. Thus, governmental or private action should take this determination into consideration when considering action. In the North Farallon Island both proposals #4 and #1-3 propose a 1000-foot SCA around the North Island. We understand that commercial and recreational fishers do not oppose this closure based on interference with fishing or navigation. Also, in the North Farallon Islands complex there are two other small islands and all three proposals recommend a 300-foot closure around those islands. We therefore urge the BRTF to adopt the SCA's proposed by proposals #4 and #1-3 for the North Farallon Island complex. As to South East Farallon Island (SEFI) all three proposals designate a 300-foot closure area around the Steller sea lion rookery areas. The only difference between all three proposals is that proposal 2XA omits an area around the Murre colony at Sugerloaf (between the two open areas). As to forage issues, while it is true that most of the Steller foraging area is outside state waters, we believe the MPA's proposed in all three proposals, we believe, can provide important additional forage and we therefore recommend the BRTF adopt those MPA's as well. Thus, we believe that SCA's for Stellar sea lions can lead to a benefit for that species.

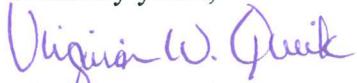
As to harbor seals, only one area (Bean Hollow SCA) is designed specifically to benefit a harbor seal rookery. It is a small seasonal one. It appears only in proposal #1-3. During the RSG negotiations a number of sites to protect harbor seal rookeries were proposed. SCA's at Clam and Seal islands inside Tomales Bay and three areas inside Drakes Estero were dropped during the compromise negotiations. Since the completion of the proposals, we have had discussions with other parties regarding Bean Hollow SCA. We understand the California Coastal Commission has some concerns regarding SCA's on areas that might have public access. We believe that with the cooperation of State Parks and other NGO's that an education and signage program could be sufficient to ameliorate rookery disturbance. Since TMMC was the originator of this proposed SCA we believe that not designating the area as an SCA will not face opposition. Therefore, we recommend that the Bean Hollow proposed SCA not be included in any preferred alternative plan.

Regarding other proposed SCA's we recognize that the primary importance is protection of seabird colonies and roosts. In many of those areas, many of those off shore rocks also provide haul out areas for pinnipeds. Therefore, we support the other SCA's proposed in the proposals.

As to the MPA's proposed in the three packages, we support the concept of MPA's as they are proven to improve ecosystems. A healthy ecosystem also provides for greater population health and strength of both pinnipeds (seals and sea lions) and cetaceans (whales and dolphins). All three proposed packages provide significant improvement over current ocean protections and we strongly support the proposed package that provides the greatest protection, package #4.

In summary, we support the SCA's at the North Farallon Islands set forth in package #1-3 and #4. For the South East Farallon Island we support the SCA's in all three packages as to protection of marine mammals. As to Bean Hollow SCA we do not oppose eliminating it from package 1-3. We also believe that establishing a series of marine reserves can improve forage for marine mammals and urge adoption of a proposed alternative that provides the greatest ecosystem protection.

Sincerely yours,



Virginia W. Quick  
Interim Executive Director